

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DIMITRIUS THOMAS)	
)	
Plaintiff,)	Case No. 15 C 6465
)	
v.)	Honorable Sharon Johnson Coleman
)	Presiding Judge
MICHAEL EVANS, et al.)	
)	Honorable Jeffery T. Gilbert
Defendants.)	Magistrate Judge
)	

FEDERAL RULE 26(f) JOINT PROPOSED DISCOVERY SCHEDULE

NOW COME the parties by their respective counsel and for the submission of their Joint Proposed Discovery Schedule, pursuant to Federal Rule 26(f), states as follows:

Joint Proposed Discovery Schedule

Counsel for the Plaintiff having been appointed to represent Mr. Dimitrius Thomas in this matter is proposing the following discovery schedule:

- i. Counsel for the Plaintiff is aware that prior to being appointed in this matter, some limited discovery was exchanged between the Defendants and Plaintiff Thomas. However in an effort to insure that full and complete disclosures are made between the now equally represented parties, both parties propose that all information required by Federal Rule 26(a)(1) be exchanged by and between the parties by February 7, 2017.
- ii. The general type of discovery needed in this matter will consist of written discovery, which will include interrogatories and production requests. Upon receipt of answers from each respective party, Plaintiff will thereafter need to conduct depositions of the 5 named Defendants, Inmate Rood, I.D. #B85018, Correctional Officer Babin and several other correctional employees. Neither party believes that discovery will involve electronically stored information (ESI). Plaintiff further believes the Defendants will seek a protective order regarding potential security interests of the Illinois Department

of Corrections (“IDOC”), to prevent inmates, including Plaintiff, from obtaining personal information of any current or former IDOC employees.

- iii. Given the nature and scope of discovery required in this matter, both parties propose that the parties issue written discovery by February 13, 2017.
- iv. Both parties further propose that all non-expert fact discovery be complete by May 17, 2017.
- v. None of the parties currently contemplate a need for retained expert discovery pursuant to Rule 26(a) (2). However, there will be a need to depose at least one medical treater assuming there is no stipulation to documentation reflecting Plaintiff’s medical care and treatment.

Both parties propose that the court set a court status date of March 16, 2017 for the parties to report on the status of discovery.

Respectfully Submitted,

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